

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLIOTT CITY, MD 21042

410-964-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311

201-342-6665

June 4, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. On Monday, June 7, 2021, Hlday is scheduled to undergo testing for a condition disclosed to Pretrial Services and the government. This testing requires removal of his location monitoring bracelet. Pretrial Services (“Pretrial”) has advised me that upon permission of the Court, Mr. Hlday can make arrangements with Pretrial in his supervising district for the removal and prompt reattachment of the device. According, defendant respectfully requests that the Court permit removal of the bracelet on June 7, 2021 as directed by Pretrial. The government, by Assistant United States Attorney Mark Bini, and Pretrial, by United States Pretrial Officer, Ramel Moore, consent to this application.

I apologize for the lateness of this request. Defendant has been awaiting the government’s position on these applications and received a response this morning. Thank you for Your Honor’s consideration of this request.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Sarah Evans (by ECF)
AUSA Mark Bini (by ECF)
USPTO Ramel Moore (by email)